

**LEILA W. MORGAN**  
California State Bar No. 232874  
**FEDERAL DEFENDERS OF SAN DIEGO, INC.**  
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Attorneys for Ms. Salazar-Sandoval

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
(HONORABLE MARILYN L. HUFF)

UNITED STATES OF AMERICA,	)	Case No. 08cr0285-H
	)	
Plaintiff,	)	DATE: March 17, 2008
	)	TIME: 2:00 p.m.
v.	)	
	)	NOTICE OF MOTIONS AND MOTIONS:
ESMERALDA SALAZAR-SANDOVAL,	)	
	)	(1) TO COMPEL DISCOVERY;
Defendant.	)	(2) TO PRESERVE AND REWEIGH
	)	NARCOTICS EVIDENCE; AND
	)	(3) TO GRANT LEAVE TO FILE
	)	FURTHER MOTIONS

TO: KAREN HEWITT, UNITED STATES ATTORNEY; AND  
REBECCA KANTER, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on March 17, 2008 at 2:00 p.m., or as soon thereafter as counsel may be heard, the defendant, Esmeralda Salazar-Sandoval, by and through her counsel, Leila W. Morgan, and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

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**MOTIONS**

The defendant, Esmeralda Salazar-Sandoval, by and through her attorneys, Leila W. Morgan, and Federal Defenders of San Diego, Inc., pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

- 1) Compel Discovery;
- 2) to Preserve and Reweigh Narcotics Evidence;
- 3) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

DATED: March 10, 2008

/s/ Leila W. Morgan  
**LEILA W. MORGAN**  
Federal Defenders of San Diego, Inc.  
Attorneys for Ms. Salazar-Sandoval  
Leila\_Morgan@fd.org

**CERTIFICATE OF SERVICE**

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of her information and belief, and that a copy of the foregoing document has been served this day upon:

Rebecca Kanter  
U S Attorneys Office Southern District of California  
Criminal Division  
880 Front Street  
Room 6293  
San Diego, CA 92101  
(619)557-5610  
Fax: (619)235-2757  
Email: Rebecca.Kanter@usdoj.gov

Dated: March 10, 2008

/s/ Leila W. Morgan  
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